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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

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5 Estate of VALERIE YOUNG, by VIOLA YOUNG,
6 as Administratrix of the Estate of
7 Valerie Young, and in her personal
8 capacity, SIDNEY YOUNG, and LORETTA
9 YOUNG LEE,

10 Plaintiffs,

11 vs. Index No.:
12 07CV6241

13 STATE OF NEW YORK OFFICE OF MENTAL
14 RETARDATION AND DEVELOPMENTAL
15 DISABILITIES, PETER USCHAKOW,
16 personally and in his official
17 capacity, JAN WILLIAMSON, personally
18 and in her official capacity, SURESH
19 ARYA, personally and in his official
20 capacity, KATHLEEN FERDINAND,
21 personally and in her official
22 capacity, GLORIA HAYES, personally and
23 in her official capacity, DR. MILOS,
24 personally and in his official capacity,

25 Defendants.

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April 7, 2008
10:11 a.m.

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18 Examination before trial of KATHLEEN

19 A. FERDINAND, held at the offices of The
20 Catafago Law Firm, P.C., 350 Fifth Avenue,
21 New York, New York, pursuant to Notice,
22 before Wendy D. Boskind, a Registered
23 Professional Reporter and Notary Public
24 of the State of New York.

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2 A P P E A R A N C E S:

3

4 THE CATAFAGO LAW FIRM, P.C.

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12 STATE OF NEW YORK

13 OFFICE OF THE ATTORNEY GENERAL

14 ANDREW M. CUOMO

15 Attorneys for Defendants

16 120 Broadway

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18 BY: JOSE L. VELEZ, ESQ.

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20

21 ALSO PRESENT:

22 PATRICIA PAWLOWSKI, ESQ.

23 Counsel's Office

24 Office of Mental Retardation

25 and Developmental Disabilities

1 Ferdinand

2 A. Yes, I do.

3 Q. What does "1:1" mean?

4 A. That means she got one-to-one
5 supervision.

6 Q. What is "one-to-one
7 supervision"?

8 A. Basically, we have one staff
9 assigned to Valerie, to watch Valerie.

10 Q. 24 hours/seven days a week?

11 A. I don't know how it was
12 ordered.

13 If it was ordered that way,
14 yeah.

15 Q. And were logbooks prepared by
16 the person supervising one-to-one?

17 A. Yes.

18 Q. And that would have been
19 prepared?

20 A. Excuse me?

21 Q. And that would have been
22 maintained?

23 A. Yes.

24 MR. CATAFAGO: Counselor, we
25 haven't received any logbooks.

1 Ferdinand

2 MR. VELEZ: Yes, you have.

3 MR. CATAFAGO: One-to-one

4 models?

5 MR. VELEZ: At least 500

6 pages or --

7 MR. CATAFAGO: Okay, I stand

8 corrected.

9 Q. So did you look at the one-
10 to- one logbooks at all?

11 Is that part of your job, or

12 no.

13 A. Periodically, I might look at
14 it.

15 Q. Did you ever notice anything
16 unusual?

17 A. But I, generally, you know,
18 when a consumer is on one-to-one, that's
19 the highest level of supervision so,
20 generally, I probably would almost ask on
21 a daily basis how the consumer is doing
22 and talk to staff and find out.

23 Q. Who were the staff members in
24 charge of the one-to-one?

25 A. I don't remember that.